

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: KEVIN J. CLIFTON, JR. and  
JULIETTE C. CLIFTON, Debtors Case No. 08-50372 ERG  
Chapter 13 Proceeding

DEBTOR'S RESPONSE TO OBJECTION TO CONFIRMATION OF  
CHAPTER 13 PLAN BY THE ESTATE OF ANGIE B. BURSTEIN (DK #20)

COME NOW the Debtors herein, KEVIN J. CLIFTON, JR. and JULIETTE C. CLIFTON, by and through their Counsel of Record, David L. Lord, and file their Response to the Objection to Confirmation of Chapter 13 Plan heretofore filed by THE ESTATE OF ANGIE B. BURSTEIN (DK #20) and would show unto the Court the following, to-wit:

1. Debtors deny the allegations of Paragraph I and would affirmatively show that the Estate of Angie B. Burstein is presently being challenged as having been created and established pursuant to false information and that the creation, establishment and continuation of the estate proceedings are without merit in law or fact. The Debtors would further allege that upon a hearing in the Chancery court of Harrison County, Mississippi the authority of the representatives of the estate will be terminated and good and valid authority to act on behalf of the estate will rest with the Debtor, Juliette C. Clifton.

2. Debtors deny the allegations of Paragraph II.
3. Debtors deny the allegations of the "WHEREFORE,

PREMISES CONSIDERED..." paragraph and each of its subparagraphs.

WHEREFORE, PREMISES CONSIDERED, Debtors respectfully pray that this honorable court will deny the Objection and allow their Plan to proceed to confirmation as proposed or hereafter modified or amended. Debtors pray for general relief.

Respectfully submitted this the 21<sup>st</sup> day of June 2008.

KEVIN J. CLIFTON, JR. and JULIETTE C.  
CLIFTON, Debtors by

/S/David L. Lord  
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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I have this day served, either electronically by the *Notice of Electronic Filing* or mailed, postage prepaid, by First Class U.S. Mail, a true and correct copy of the above and foregoing *Response to Objection to Confirmation of Chapter 13 Plan* (DK #20) to the parties listed below, this 21<sup>st</sup> day of June 2008.

/S/David L. Lord  
David L. Lord, For the Firm

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